



CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY



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LINDA S. ADAMS
SECRETARY FOR
ENVIRONMENTAL PROTECTION

ARNOLD SCHWARZENEGGER
GOVERNOR

Certified Mail: 7003 1680 0000 6174 9347

December 13, 2007

Mr. Dean Wilson
Water Pollution Control Manager
San Leandro City Environmental Services Division
3000 Davis Street
San Leandro, California 94577

Dear Mr. Wilson:

The California Environmental Protection Agency (Cal/EPA) conducted a program evaluation of the City of San Leandro Hazardous Materials Division's Certified Unified Program Agency (CUPA) on November 14, 2007. The evaluation was comprised of an in-office program review. Cal/EPA completed a Certified Unified Program Agency Evaluation Summary of Findings with your agency's program management staff, which includes identified deficiencies, with preliminary corrective actions and timeframes, program observations and recommendations, and examples of outstanding program implementation.

The enclosed Evaluation Summary of Findings is now considered final and based upon review, I find that the City of San Leandro Hazardous Materials Division's program performance meets or exceeds standards.

Cal/EPA also noted during this evaluation that the City of San Leandro Hazardous Materials Division has worked to bring about a number of local program innovations, including the implementation of America Recycles Day for the residential community and the use of FileMaker Pro to track CUPA and non-CUPA related data. We will be sharing these innovations with the larger CUPA community through the Cal/EPA Unified Program web site to help foster a sharing of such ideas statewide.

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Thank you for your continued commitment to the protection of public health and the environment through the implementation of your local Unified Program. If you have any questions or need further assistance, you may contact your evaluation team leader or Jim Bohon, Manager, Cal/EPA Unified Program at (916) 327-5097 or by email at jbohon@calepa.ca.gov.

Sincerely,

[Original signed by Jim Bohon]

Don Johnson
Assistant Secretary
California Environmental Protection Agency

Enclosure

cc/Sent via email:

Mr. John Camp, CUPA Manager
City of San Leandro Hazardous Materials Division
835 East 14th Street
San Leandro, California 94577

Mr. Kevin Graves
State Water Resources Control Board
P.O. Box 944212
Sacramento, California 94244-2102

Ms. Terry Brazell
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Mr. Charles McLaughlin
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826-3200

Ms. Maria Soria
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, California 94710

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cc/Sent via Email:

Mr. Ben Ho
Office of the State Fire Marshal
P.O. Box 944246
Sacramento, California 94244-2460

Mr. Brian Abeel
Governor's Office of Emergency Services
P.O. Box 419047
Rancho Cordova, California 95741-9047



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CERTIFIED UNIFIED PROGRAM AGENCY EVALUATION SUMMARY OF FINDINGS

CUPA: San Leandro Environmental Services Division

Evaluation Date: November 14, 2007

EVALUATION TEAM

Cal/EPA: Kareem Taylor

This Evaluation Summary of Findings includes the deficiencies identified during the evaluation, program observations and recommendations, and examples of outstanding program implementation activities. The evaluation findings are preliminary and subject to change upon review by state agency and CUPA management. Questions or comments can be directed to Kareem Taylor at (916) 327-9557.

No deficiencies noted.

CUPA Representative

John Camp
(Print Name)

Original signed
(Signature)

Evaluation Team Leader

Kareem Taylor
(Print Name)

Original signed
(Signature)

Certified Unified Program Agency (CUPA)
Evaluation Summary of Findings

PROGRAM OBSERVATIONS AND RECOMMENDATIONS

The observations and recommendations provided in this section address activities the CUPA are implementing and/or may include areas for continuous improvement not specifically required of the CUPA by regulation or statute.

- 1. Observation:** Cal/EPA was impressed with the CUPA's FileMaker Pro database. The CUPA staff person who customized the database did a great job of organizing the CUPA program element data regarding facility inspections, single fee invoices, violations, and enforcement actions. There is more on this in the outstanding program implementation section.

Recommendation: The CUPA may want to host a workshop for other CUPAs about their FileMaker Pro database. The organization and format of this database could be beneficial for others to observe.

- 2. Observation:** The CUPA inspection reports reviewed did not contain violation classifications.

Recommendation: Either write the appropriate violation classification for each violation on the inspection report or revise each program element inspection report to include a section to classify each violation cited.

Certified Unified Program Agency (CUPA)
Evaluation Summary of Findings

EXAMPLES OF OUTSTANDING PROGRAM IMPLEMENTATION

1. The CUPA uses a FileMaker Pro database to track data related to the Unified Program (UP), Pretreatment Program, Storm Water Program, and other programs. A CUPA staff member customized FileMaker Pro to more effectively meet the needs of the CUPA. The database tracks facility single fee invoices, inspections, enforcement actions, violations, violation follow-ups, complaints, and return to compliance. Staff training courses/workshops are also tracked along with the total staff training hours. The CUPA is meeting inspection frequencies for all UP elements because the inspectors are strictly adhering to the routine inspection dates auto-populated by FileMaker Pro. The database allows inspectors to classify violations as Class1, 2, or minor and to record specific enforcement actions (notice to comply, AEO, legal action, and even verbal notifications).

2. Many non-UST facilities are inspected on an annual basis depending on which non-CUPA program elements are involved in the inspection.

3. The San Leandro Environmental Services Division CUPA is a participant in the Alameda County District Attorney's Environmental Crimes Strike Force and the Alameda County Hazardous Materials Subcommittee meetings. The CUPA meets monthly with other federal, state and local environmental regulators working within the county. These meetings allow staff to coordinate CUPA activities, to share information on regulatory compliance and enforcement issues, to maintain consistency on CUPA issues, and to provide a forum for training.

4. The City of San Leandro has developed an informative website that provides a directory of city services. The website's contact section directs users' comments, complaints, etc. to the proper department for resolution. The CUPA section contains the hazardous materials forms and general educational information about the CUPA.

5. The CUPA received an award for excellence in pollution prevention from the San Francisco Bay Regional Water Quality Control Board. It also received a second place award from USEPA for Pretreatment Program excellence.

6. The City of San Leandro implements an America Recycles Day for the residential community two times a year. The CUPA uses these days as an opportunity to educate residents by distributing informative brochures and pamphlets. During America Recycles Day, residents may dispose the following:

- Household batteries (non lead-acid)
- Mercury thermometers and thermostats
- Medicine
- Fluorescent light bulbs and tubes
- Floppy disks, tapes, CDs, DVDs, jewel cases, and toner cartridges

7. The CUPA has integrated other program responsibilities into its UP workload. The CUPA implements the Clean Water Program, Pollution Prevention Program, Industrial Pretreatment Program, Storm Water Illicit Discharge Program, Solid Waste Program, and Contaminated Sites Program. Routine inspections often incorporate non-CUPA program elements.

Certified Unified Program Agency (CUPA)
Evaluation Summary of Findings

8. The CUPA has many informational pamphlets and guides available at the CUPA Office. These include the following:

- Mercury in the environment
- Home maintenance tips for a cleaner bay
- What is storm water pollution?
- The healthy home and garden
- About wastewater treatment
- Household hazardous waste
- Changing oil and other fluids